# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA NEWPORT NEWS DIVISION

JOHN M. PITMAN, III, et al.,	)
Plaintiffs,	) (34 ) )
v.	) Civil Action No.: 4:16-cv-179
XCENTRIC VENTURES, LLC., et al.,	) ) n **
Defendants.	)

# PLAINTIFFS' FIRST SET OF REQUESTS FOR ADMISSION TO DEFENDANT TRACEY RICHTER

Plaintiffs, John M. Pitman, III and Peninsula Plastic Surgery Center, LTD., by counsel, requests that Defendant Tracey Richter answer the following Requests for Admission in accordance with the requirements of Rule 36 of the Federal Rules of Civil Procedure:

## **REQUESTS FOR ADMISSION**

1. Admit that the audio recording enclosed herein is a true and accurate recording of your conversation with Anna Richter on February 2, 2014.

## **RESPONSE:**

2. Admit that your voice is on the audio recording enclosed herein.

### **RESPONSE:**

3. Admit that Anna Richter's voice is on the audio recording enclosed herein.

#### **RESPONSE:**

4. Admit that the voice transcribed as "TR" on the audio recording is your voice.

#### **RESPONSE:**



J STANLEY & HOUCHENS

Respectfully submitted,

JOHN M. PITMAN, III, and PENINSULA PLASTIC SURGERY CENTER, LTD

By:

Of Counsel

Aaron B. Houchens, Esq. (VSB #80489) STANLEY & HOUCHENS, LLC 13508 Booker T. Washington Hwy. Moneta, Virginia 24121 540-721-6028 (telephone) 540-721-6405 (facsimile) ahouchens@shg-law.com

Stephen M. Smith, Esq. (VSB #14362)
Seth D. Scott, Esq. (VSB #80907)
David B. Holt, Esq. (VSB #65564)
THE SMITH LAW CENTER
2100 Kecoughtan Road
Hampton, Virginia 23661
757-244-7000 (telephone)
757-245-7740 (facsimile)
ssmith@braininjurylawcenter.com
sscott@attorneys4injured.com
dholt@ attorneys4injured.com

Counsel for Plaintiffs John M. Pitman, III and Peninsula Plastic Surgery Center, LTD.

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was sent to the following, via e-mail and first class mail, postage prepaid, this 16<sup>th</sup> day of May, 2017.

David A. Warrington, Esq. LeClairRyan 2318 Mill Road, Suite 1100 Alexandria, Virginia 22314 Phone: (703) 647-5926 Fax: (703) 647-5966

david.warrington@leclairryan.com

Counsel for Defendant Xcentric Ventures, LLC and Edward Magedson

Jesse R. Binnall, Esq. Louise T. Gitcheva, Esq. Harvey & Binnall, PLLC 717 King Street, Suite 300 Alexandria, Virginia 22314 Tel: (703) 888-1930. jbinnall@harveybinnall.com lgitcheva@harveybinnall.com

Counsel for Defendants Anna Richter, Bert Pitman and Tracey Richter

